Memorandum

Flex your power!
Be energy efficient!

To: SRIKANTH BALASUBRAMANIAN
Project Manager

Date: May 29, 2002

File: 09-30520

From: BRAD METTAM
DEPARTMENT OF TRANSPORTATION
DISTRICT 9

Subject: Comments on Revison 2 of the Draft Feasibility Study Report on Potential Improvements to SR127,

Thank you for the opportunity to review this draft report.

GENERAL COMMENTS

1. This draft is a significant improvement over the first. Many of the issues raised concerning the first draft have been addressed, and the organization of the document is greatly improved.

2. There is a misunderstanding that needs to be corrected. The document refers to SR-127 as being under consideration by the DOE for use as a route to Yucca Mountain. This is not the case. The DOE's official documents only describe their routing in general terms, but those descriptions do not include the use of SR-127. The routing descriptions do assume they will be transporting through the Las Vegas Valley, probably through the center of Las Vegas. The DOE has agreed not to transport either low-level radioactive waste or transuranic waste through Las Vegas. Because of this we believe it unlikely, when the final routing and mode selections are made, that routes through Las Vegas will be used. This is why this report is being prepared.

3. The decision to rehabilitate the roadway rather than reconstruct it should be carefully considered. The 1995 Pavement Core Record (Attachment #1) should be reviewed to determine whether the base is sufficient, especially given the weight of the proposed vehicles. John Fox, District 9 Maintenance, has made the statement that Maintenance believes that complete reconstruction is the appropriate course of action.

4. The report makes no mention of potential relocation or realignment constraints due to land ownership or special designations. Many portions of SR-127 have

land covered by Death Valley National Park or BLM Wilderness designations immediately adjacent to the roadway that may constrain changes.

SPECIFIC COMMENTS

1. Engineer's Signature Page: This page refers to the report as a "Feasibility Study Report", while the rest of the document refers to it as a "Feasibility Analysis Report". This should be changed for consistency.

2. Page 1, paragraph 1: The second sentence misstates the DOE's current plans (see General Comment #2 above). This could be reworded to say: "This 146-kilometer (91) stretch of SR-127 **may be** considered by ...".

3. Page 1, paragraph 1: The last line refers to a 40 year transportation campaign. The shipments will actually last an estimated 25 years. This should be corrected wherever it appears.

4. Page 1, paragraph 5: See General Comment #2 and Specific Comment #3.

5. Page 2, paragraph 1: See General Comment #2.

6. Page 2, paragraph 2: In this paragraph, and in paragraph 1 on page 11, the route is described as being within "flat desert terrain". While this is generally true, Ibex Pass may present some obstacle to these heavy haul trucks. Profiles for the San Bernardino and the Inyo County portions are attached (Attachments #2 & 3).

7. Page 2, paragraph 3: The third sentence would be clearer if it read: "SR-127 Continues north **to** the Nevada State Line and then becomes Nevada State Highway 373....".

8. Page 8, paragraph 2: .

9. Page 9, last paragraph: See General Comment #3.

10. Page 10, first and second bullets: See General Comment #3.

11. Page 10, Drainage: See General Comment #4.

12. Page 10, Alternatives: The impacts of the "No Build" alternative should be described.

13. Page 11, paragraph 3: SR-127 was adopted in 1933.

14. Page 12, paragraph 5: See Specific Comment 3.

15. Page 14, Funding/Scheduling: The paragraph in bold on page 15, concerning "the level of detail available..." should be reproduced here, with "Project Report" changed to "Project Study Report".

16. Page 16, all: Discussions of programming should be deleted.

17. Plans, Baker Bypass: During the field review, we had discussed connecting to the eastbound off-ramp shown at the extreme left of your drawing. As the heavy haul trucks will all be coming from this direction, this should be included.

We look forward to reviewing this document in the very near future. The pace of the selection of a site for the only United States repository for high-level radioactive waste is accelerating. Therefor, the need for a well-reasoned, defensible estimate of the costs involved, should State Route 127 be selected as a route to Yucca Mountain, becomes ever more important. We remain committed to assisting in the production of a quality Feasibility Study Report for this project.

BRAD R. METTAM
Chief, Office of Regional Planning

c: Katy Walton, D9 Deputy District Director, Planning & Programming
Tom Hallenbeck, D9 District Director
Kim Anderson, Chief, Central Region Project Development

BRM/brm

Attachment #1

...TMENT OF TRANSPORTATION
...ON OF CONSTRUCTION

...VEMENT CORE RECORD

09 County Inyo Rte. 127 P.M. 000-49.42

Contract No. ______ Sheet ______
Cored By: Tim Donnelly Date 5-17-8?
Dynaflect By: Paul Mason

SOURCE	CHARGE	EXPENDITURE AUTHORIZATION	SPECIAL DESIGNATION (USE WHEN APPLICABLE)	ACTIVITY OR OBJECT

CORE NO.	LOCATION: STATION (PM)	LOCATION: LANE	LOCATION: POSITION	PAVEMENT THICKNESS (FT)	Remarks chip seal 0.0/6+
1	0.152	NBnd	℄ lane	0.63'AC	lt. br. sandy gravel block cracking over native cut is colluvium - N. Ibex Pass chip seal
2	0.518	SBnd	✓	0.40'AC over	native alluv. fan lt br gr sd - chip seal / block cracking continues
3	1.015	NBnd	✓	0.20'AC over	native (lt. br. to tan gravelly sand caliche?) 0.584 long. & transverse cracks block crack con fence 0.900 end of block cracking
4	1.528	SBnd	✓	0.25'AC over	native tan gr. sand/silt transverse & block cracking
5	2.040	NBnd	✓	0.28'AC over	native tan gr. sand/silt alluvial fan block cracks
6	2.120	✓	✓	0.21'AC over	native - block cracking, tan sd/silt w/ little gravel
7	2.511	SBnd	✓	0.33'AC over	0.37' lt br. sand over native
8	3.00	NBnd	✓	0.32'AC over	native gr sd - tan - block cracks 3.00 coarse chip seal ? older chip seal cracks sealed
9	3.55	SBnd	✓	0.24'AC over	native - tan gr sd (block cracking)
10	4.00	NBnd	✓	0.22'AC over	native gr sd tan alluv. fan transverse cracks
11	4.50	SBnd	✓	0.32'AC over	native - gr sd - block cracking 4.7 silt in roadcut
12	5.05	NBnd	✓	0.20'AC over	0.40' br f. sd over native (gr sd.)
13	5.525	SBnd	✓	0.50'AC over	native tan gr sand - ~~[illegible]~~ transverse cracks
14	6.05	NBnd	✓	0.10'AC over	0.30'RMAS over native (gr sd 0.30') transverse cracks
15	6.20	✓	✓	Patch + chip seal	+ 0.10'AC + 0.32'RMAS over native tan silt
16	6.05? 6.5?	SBnd		0.08'AC over	6.35 End of Metal Plates - chip seal cont. 0.34'RMAS over native transverse cracking

DEPARTMENT OF TRANSPORTATION
DIVISION OF CONSTRUCTION

PAVEMENT CORE RECORD

09 County INY Rte. 127 P.M. 8.0/79.42

Contract No. _____ District _____

Cored By: T. Donnelly Date 5-17-95

Dynoflect By: P. Mason

SOURCE	CHARGE	EXPENDITURE AUTHORIZATION	SPECIAL DESIGNATION (USE WHEN APPLICABLE)	ACTIVITY OR OBJECT

CORE NO.	LOCATION			PAVEMENT THICKNESS (FT)	Remarks
	STATION (PM)	LANE	POSITION		
17	7.02	NBnd	℄ Lane	0.22' AC over	chip seal continuous transverse cracking — some block cracking 0.20' RMAS over gr. sd (native)
18	7.52	SBnd	✓	0.22' AC over	0.30' RMAS over native - fan silt transverse cracking
19	8.10	NBnd	✓	0.25' AC over	0.35' RMAS over native - fan silt - transverse cracks
20	8.52	SBnd	✓	0.21' AC over	0.22' RMAS over fill (1') over fan silt block & transverse cracks)
21	9.02	NBnd	✓	0.10' AC over	0.50' RMAS over native fan silt block cracking
22	9.53	SBnd	✓	0.12' AC over	0.31' RMAS over native (fill) gravelly sd Transverse & block cracks -
23	10.02	NBnd	✓	0.11' AC over	0.24' RMAS over native gr. sd transverse cracks
24	10.52	SBnd	✓	0.08' AC over	0.28' RMAS over 2.0± fill material transverse cracks
25	11.01	NBnd	✓	0.12' AC over	0.30' RMAS over 2.0± fill material block & transverse cracks
26	11.51	SBnd	✓	0.11' AC over	0.15' RMAS over 1.0± fill over lake beds
27	12.01	NBnd	✓	0.12' AC over	0.20' RMAS over 2.0± fill over lake deposits 12.95 End RA alig. block cracks
28	12.51	SBnd	✓	0.31' AC over	0.31' RMAS over native silt - in road cut few settlement cracks
29	13.01	NBnd	✓	0.24' AC over	12.55 End of cut still transverse cracks 3-4' fill 12.87-15.00 cut 0.63± RMAS over 15-20' fill
30	13.52	SBnd	✓	0.13' AC over	transverse cracks 0.40' RMAS over silt (native)
31	14.00	NBnd	✓	0.17' AC over	0.53' RMAS over native transverse cracks thru Moist patch
32	14.50	SBnd	✓	0.15' AC over	0.83' RMAS over native gr sd transverse cracks

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Control No. ______

Cored By: T. Donnelly Date 5-18-95

Dynaflect By: P. Mason

SOURCE	CHARGE	EXPENDITURE AUTHORIZATION	SPECIAL DESIGNATION (USE WHEN APPLICABLE)	ACTIVITY OR OBJECT
1				

CORE NO.	LOCATION: STATION (PM)	LOCATION: LANE	LOCATION: POSITION	PAVEMENT THICKNESS (FT)	Remarks
33	15.02	NBnd	℄ Lane	0.13' AC over	[illegible] over 3.0± fill; transverse some block cracks
34	15.49	SBnd	✓	0.16' AC over	0.34' RMAS over native gr sd ~ silt below; southbound block cracking
35	15.99	NBnd	✓	0.16' AC over	0.23' RMAS over native +24 grav. sd; some transverse cracks
36	16.52	SBnd	✓	0.19' AC over	0.18' RMAS over native; 16.27 End of chip seal start med-fine chip seal
37	17.02	NBnd	✓	0.08' AC over	0.26' RMAS over Lt br f si sd; few transverse cracks some block cracking
38	17.51	SBnd	✓	0.15' AC over	0.35' RMAS over native gr sd; few transverse cracks
39	18.02	NBnd	✓	0.11' AC over	0.30' RMAS over Lt br sd; inside white crack (depressed) few transverse cracks
40	18.5[illegible]	SBnd	✓	0.10' AC over	0.40' RMAS over native Lt. br. gr sd; transverse cracking
41	19.01	NBnd	✓	0.10' AC over	0.28' RMAS over native Lt br. gr sd; Block cracking thru chip seal
42	19.52	SBnd	✓	0.10' AC over	0.28' RMAS over native Lt br gr sd; block cracking
43	20.01	NBnd	✓	0.10' AC over	0.35' RMAS over native; block cracking / transverse
44	20.58	SBnd	✓	0.12' AC over	IN CUT 0.24' RMAS over native; block cracking in the cuts no cracks visible northward
45	21.02	NBnd	✓	0.10' AC over	0.21' RMAS over fill gr sd; no cracks visible
46	21.54	SBnd	✓	0.09' AC over	0.22 RMAS over fill; no cracks
47	22.01	NBnd	✓	0.09' AC over	0.26' RMAS over native Lt br gr sd; no crack visible ~~through chip seal~~
48	22.52	SBnd	✓	0.10' AC over	0.23' RMAS over 4' fill gr sd silt (cemented?) no cracks

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PAVEMENT CORE RECORD

09 County LAK Rte. 127 P.M. 0.9/49.42

Contract No.:

Cored By: T. DONNELLY Date 5-19-95

Dynaflect By: P. MASOAI

SOURCE	CHARGE	EXPENDITURE AUTHORIZATION	SPECIAL DESIGNATION (USE WHEN APPLICABLE)	ACTIVITY OR OBJECT

CORE NO.	LOCATION			PAVEMENT THICKNESS (FT)	Remarks
	STATION (PM)	LANE	POSITION		
49	23.02	NBnd	E	0.10'AC over	0.23'RMAS over native tan gr sd (caliche cement) few transverse cracks
50	23.52	SBnd	✓	0.10'AC over	0.28'RMAS over native – gr sd w/caliche cement in cut start transverse cracks
51	24.01	NBnd	✓	0.20'AC over	0.20'RMAS over native transverse cracking occasional long. in wh. tr. / block cracks
52	24.52	SBnd	✓	0.15'AC over	0.20'RMAS over native gr sd w/silt tan to Lt. br. transverse cracking large block cracking caliche in cuts
53	25.02	NBnd	✓	0.11'AC over	0.34'RMAS over native Lt br si sd w/minor gravel no cracks showing thru chip seal
54	25.52	SBnd	✓	0.14'AC over	0.24'RMAS over tan silt Minor patch NBnd Ln. alligator cracks reflecting thru chip seal in wh. tracks
55	26.15	NBnd	✓	0.10'AC over	0.30'RMAS over fill Lt br gr sd No cracks thru chip seal – on fill
56	26.51	SBnd	✓	0.09'AC over	0.30'RMAS over native Lt br gr si sd transverse & longitudinal cracks
57	27.01	NBnd	✓	0.10'AC over	0.27'RMAS over fill native Lt br gr silty sd Alligator cracking in wh. tr.
58	27.51	SBnd	✓	0.13'AC over 0.	16'RMAS over native fill
59	28.01	NBnd	✓	0.15'AC over	0.18'RMAS over native tan sd silt occasional transverse
60	28.51	SBnd	✓	0.14'AC over	0.25'RMAS over fill 5± no visible cracks
61	29.01	NBnd	✓	0.14'AC over	0.35'RMAS over fill native 2't
62	29.51	SBnd	✓	0.19'AC over	0.24'RMAS over native block cracks area
63	30.01	NBnd	✓	0.14'AC over	0.35'RMAS over native tan silty gr sd Block cracking
64	30.51	SBnd	✓	0.17'AC over	0.16'RMAS over native gr sd Large block cracks

PARTMENT OF TRANSPORTATION
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AVEMENT CORE RECORD

Cored By: T. DONNELLY Date 5-19-95

Dynaflect By: P. MASON

09 County LAK Rte. 127 P.M. 0.0/49.42

SOURCE	CHARGE	EXPENDITURE AUTHORIZATION	SPECIAL DESIGNATION (USE WHEN APPLICABLE)	ACTIVITY OR OBJECT

CORE NO.	LOCATION			PAVEMENT THICKNESS (FT)	Remarks
	STATION (PM)	LANE	POSITION		
65	31.01	NBnd	℄	0.17' AC over	block cracking thru chip seal – mud pumping 0.13' RMAS over silt thru cracks
66	31.51	SBnd	✓	0.15' AC over	No cracks thru chip seal 0.44' RMAS over native gr sd
67	32.02	NBnd	✓	0.18' AC over	No cracks 0.19' RMAS over native gr sd
68	32.52	SBnd	✓	0.10' AC over	no cracks 0.40' RMAS over fill to gr si sd
69	33.02	NBnd	✓	0.17' AC over	occassional transverse crack 0.28' RMAS over native
70	33.52	SBnd	✓	0.13' AC over	No cracks thru chip seal 0.35' RMAS over native gr. sd (fill)
71	34.02	NBnd	✓	0.14' AC over	few transv. 0.93' RMAS over native Lt br gr sd
72	34.52	SBnd	✓	0.12' AC over	transverse cracks 10' apart - started 34.5'o 0.45' RMAS
73	35.02	NBnd	✓	0.12' AC over	cracks continues some block cracking 0.23' RMAS over Lt br gr. sd
74	35.52	SBnd	✓	0.13' AC over	cracks continue 0.20' RMAS over native gr sd 5-22-95
75	36.02	NBnd	✓	0.08' AC over	block & transverse cracking 0.25' RMAS over native Lt br gr sd
76	36.51	SBnd	✓	0.13' AC over	transverse cracks & long. cracks 0.23' RMAS over native Lt br gr. sd
77	37.01	NBnd	✓	0.10' AC over	transverse cracks 0.20' RMAS over native Lt br gr sd
78	37.51	SBnd	✓	0.09' AC over	transverse cracking 0.25' RMAS over native Lt br gr sd
79	38.01	NBnd	✓	0.10' AC over	transverse & block cracks 0.15' RMAS over native Lt br gr. sd.
80	38.52	SBnd	✓	0.13' AC over	transverse & block cracks 0.34' RMAS over native Lt br gr sd

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…VEMENT CORE RECORD

…09 County INY Rte. 127 P.M. 0.0/49.42

Contract No. ______
Cored By: T. DONNELLY Date 5-22-9[illegible]
Dynaflect By: P. MASON

SOURCE	CHARGE	EXPENDITURE AUTHORIZATION	SPECIAL DESIGNATION (USE WHEN APPLICABLE)	ACTIVITY OR OBJECT

CORE NO.	LOCATION STATION (PM)	LANE	POSITION	PAVEMENT THICKNESS (FT)	Remarks — Section thru DVJ no chip seal
31	39.01	NBnd	℄ Ln	0.10' AC over	0.31' RMAS over native lt br gr sd; trans. & block cracks
32	39.51	SBnd	✓	0.09' AC over	0.35' RMAS over native lt br gr sd; transverse crack
33	40.02	NBnd	✓	0.10' AC over	0.31' RMAS over native lt br gr sd; transverse cracking
34	40.51	SBnd	✓	0.14' AC over	0.35' RMAS over native ditto
35	41.01	NBnd	✓	0.12' AC over	0.23' RMAS over native lt br silty gr sd; transverse cracking
36	41.51	SBnd	✓	0.15' AC over	0.17' RMAS over native lt br gr si/sd; transverse; cemented; End chip seal (thru DVJ)
37	42.01	NBnd	✓	0.26' AC over	0.13' RMAS over oiled native sd/silt; transverse more cracking NBnd ln.
38	42.51	SBnd	✓	0.32' AC over	0.31+ RMAS few transverse cracks; start chip seal N of Rte 190; (RMAS very friable from this point)
39	43.01	NBnd	✓	0.43' AC over	0.42' RMAS over native silty sd w/ gravel; transverse cracks
40	43.50	SBnd	✓	0.25' AC over	0.55' RMAS over native ✓ ditto
41	44.01	NBnd	✓	0.25' AC over	0.25' RMAS over native silty sd w gravel; few transverse cracks, not sealed
42	44.51	SBnd	✓	0.33' AC over	0.50' RMAS over native ditto; transverse cracks reflecting thru chip seal
43	45.01	NBnd	✓	0.21' AC over 0.	32' RMAS over native si/sd w gravel; transverse cracks
44	45.51	SBnd	✓	0.30' AC over	0.22' RMAS over native ditto
45	46.01	NBnd	✓	0.30' AC over	0.20' RMAS over native; some block cracking
46	46.51	SBnd	✓	0.36' AC over	0.39' RMAS over native; block cracking

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AVEMENT CORE RECORD

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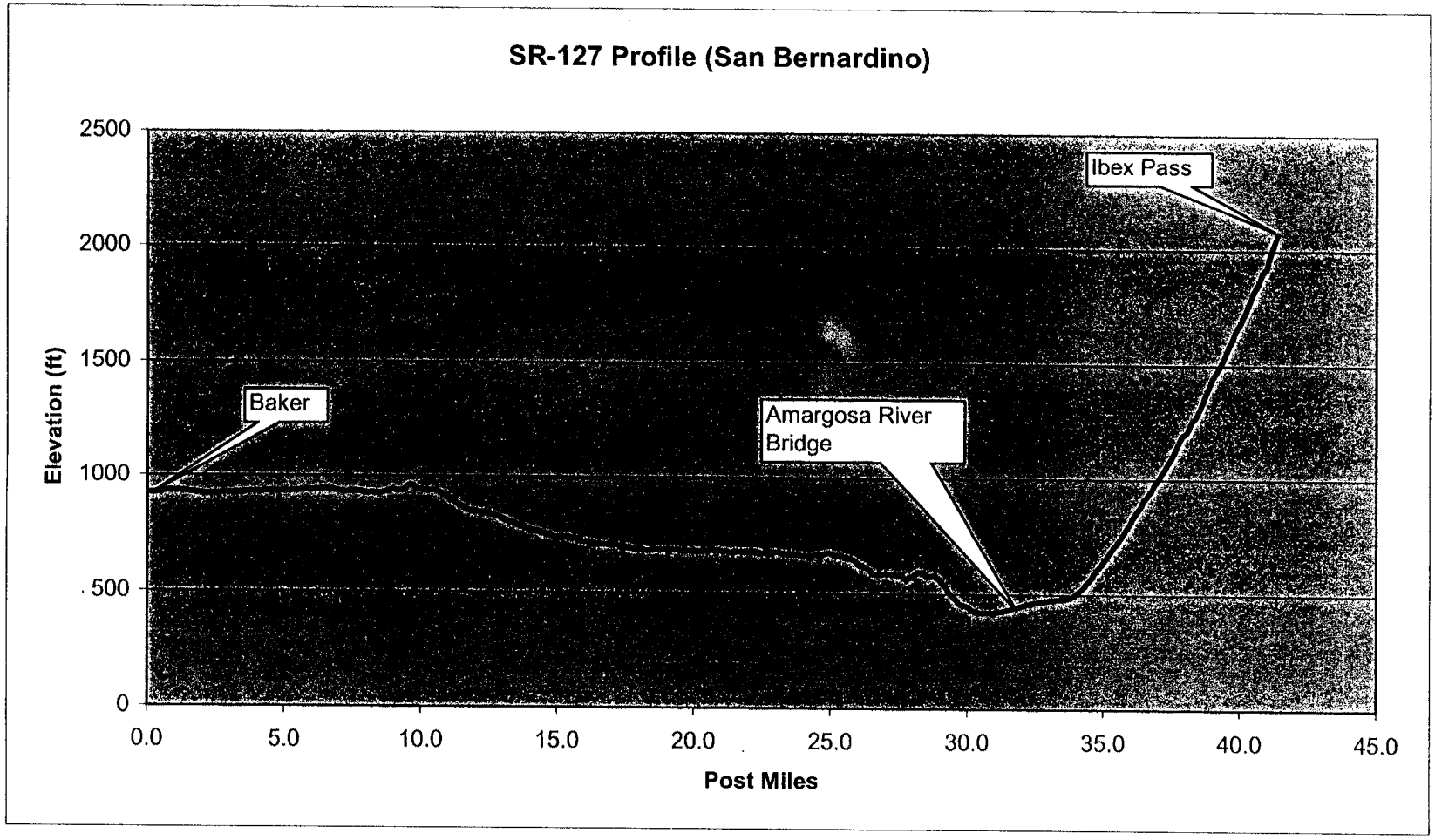
Contract No. _____

Cored By: T. Donnelly Date _____

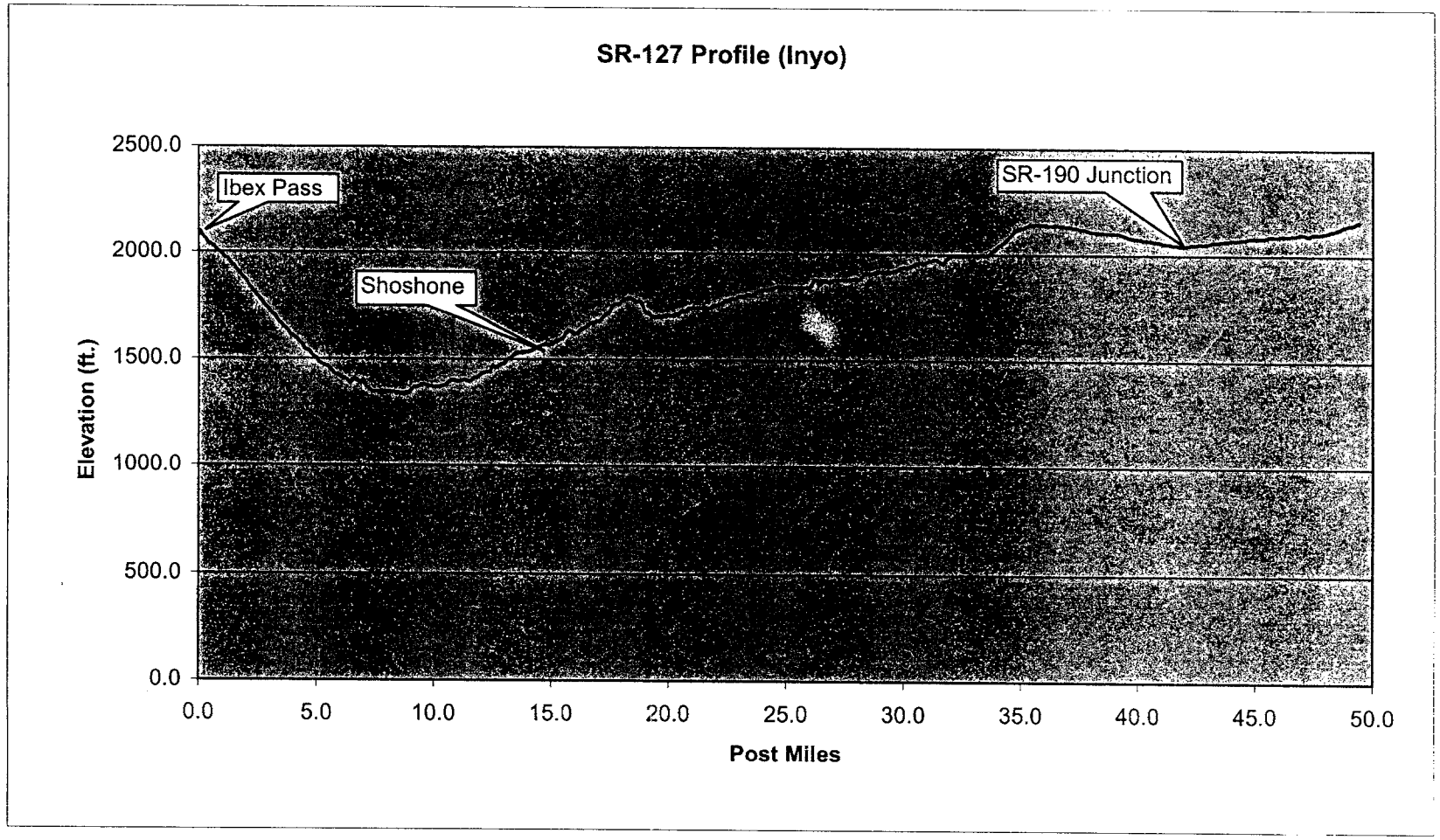
Dynaflect By: P. Mason

SOURCE	CHARGE	EXPENDITURE AUTHORIZATION	SPECIAL DESIGNATION (USE WHEN APPLICABLE)	ACTIVITY OR OBJECT

CORE NO.	LOCATION			PAVEMENT THICKNESS (FT)	Remarks RMAS very friable
	STATION (PM)	LANE	POSITION		
77	47.01	NBnd.	℄	0.28' AC over	0.22' RMAS over native (fat silty sand) some gr, transverse cracks
78	47.51	SBnd	~	0.25' AC over	0.25' RMAS over native gr si sd transverse cracks
79	48.02	NBnd	~	0.30' AC over	0.33' RMAS over native gr si sd transverse/block cracking
00	48.51	SBnd	✓	0.35' AC over	0.25' RMAS over native gr si sd transverse cracking
01	49.01	NBnd	✓	0.37' AC over	0.30' RMAS over native gr si sd transverse cracks



Attachment 2



Attachment #3